

August 20, 2003

BLM Sage Grouse Habitat Conservation Team  
1387 South Vinnell Way  
Boise, Idaho 83709-1657

SUBJECT: Draft Sage Grouse Habitat Conservation Strategy  
Project No. 03-3102

To Whom It May Concern:

The Resource Development Coordinating Committee (RDCC), representing the State of Utah, has reviewed this proposal. The Department of Natural Resources comments:

The Utah Department of Natural Resources commends the U.S. Department of the Interior, Bureau of Land Management (BLM) for preparing the national *Draft Sage-grouse Habitat Conservation Strategy*, and for including time frames for the completion of state-specific sage-grouse habitat conservation strategies. The department looks forward to assisting the BLM as it prepares Utah's state-specific strategy.

The department reminds the BLM of the commitment to consider "*Guidelines to Manage Sage-grouse Populations and Their Habitats*" by J. W. Connelly, M. A. Schroeder, A. R. Sands and C. E. Braun (2000. *Wildlife Society Bulletin* 28:967-985) in BLM's planning process. Said commitment is contained in the 2000 Memorandum of Understanding among the Western Association of Fish and Wildlife Agencies; U. S. Department of Agriculture, Forest Service; U. S. Department of the Interior, Fish and Wildlife Service and BLM.

In addition, the department urges the BLM to allow broad-based vegetation management practices for the purposes of sage-grouse habitat improvements. During the 2002 General Session of the Utah State Legislature, Senate Concurrent Resolution 2, also called the "Resolution Urging Vegetation Management Practices on BLM Ground," was passed and signed by Governor Leavitt. A similar resolution, titled "Vegetation Management Practices on BLM Land," was later passed by the Western Association of Fish and Wildlife Agencies. These resolutions encourage the use of a full set of vegetation management tools, including mechanical and chemical treatments, as well as the seeding of some nonnative plant species, to improve rangeland conditions. The department believes this full set of vegetation management tools is necessary to improve and properly manage sage-grouse habitat.

Specific comments from the department's Division of Wildlife Resources, pertaining to the national *Draft Sage-grouse Habitat Conservation Strategy*, are as follows:

1. Add a date to the draft to reduce confusion if future drafts are released before a final strategy is produced.
2. Include specific references when scientific literature is cited in the strategy rather than simply including a "Literature Relevant..." section containing a myriad of literature reviewed. For example, in the Introduction, second paragraph, fifth line, there is reference to sage-grouse populations declining "throughout North America by 33 percent over the past 30 to 40 years...." This is a significant statistic that could be questioned, but the reader is not provided with the source of the statistic. There are numerous important statements contained in the strategy that are not attributed to a source.
3. Specific sage-grouse common names should be capitalized, i.e., "greater" should be "Greater." There seems to be current confusion within the scientific community regarding the capitalization of the words "sage-grouse" when combined with the common names of Greater or Gunnison, and so either of the following seems acceptable: "Sage-grouse" or "Sage-grouse."
4. In section III, paragraph two, it should be clarified that WAFWA is currently working on a Conservation Assessment of the Greater Sage-grouse only, whereas the states of Colorado and Utah are working separately on a Conservation Plan for Gunnison Sage-grouse.
5. On page four, paragraph one, please list the official draft title of the "...science-based procedures that use existing information to conduct regional sagebrush habitat assessments...." The public will be highly interested in these procedures and it will be important that these procedures be recognized by other land management agencies and state wildlife agencies in comparing range conditions throughout the West.
6. On page four, paragraph two, it would be useful to give a brief explanation of the Great Basin Restoration Initiative. It also would be helpful to explain where the public can obtain additional information on this initiative.
7. On page four, paragraph three, it would be useful to explain where the public can obtain further information on the status of the Plant Conservation Alliance.
8. The practice of coalbed methane extraction should be discussed throughout section V, as this resource development activity appears to have the potential to impact sage-grouse habitats throughout the West.
9. In section V, the Altered Fire Regimes, Sagebrush Destruction, Conifer Woodland Encroachment, and Weed Infestation paragraphs should include statistics on the history of BLM acres burned by wildfire and prescribed burns, acres of sagebrush treated, acres of sagebrush encroached by coniferous woodland species, and acres of sagebrush invaded by noxious weeds, respectively. These statistics will be critical to the development of state-specific strategies that assess changes in sage-grouse habitats through time and space.

10. On page 11, bulleted statement nine, please include the specific Federal Register reference for BLM Rangeland Health Standards.

11. On page 12, bulleted statement one, describe specifically how annual progress will be reported, e.g., written reports, Internet and news releases. Please explain if/how individuals can have their names placed on a mailing list for annual reports.

12. Throughout much of section X, there is mention of the “development,” “issuance” or “provision” of guidance on “Best Management Practices” for sage-grouse habitats. As previously mentioned, we remind the BLM of their commitment in the 2000 WAFWA Memorandum of Understanding to consider Connelly et al. (2000) in their planning process rather than developing a separate set of guidelines.

If you have questions, please call Mr. Dean Mitchell, Upland Game Program coordinator, Division of Wildlife Resources, Salt Lake City office, (801) 538-4786.

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Resource Development Coordinating Committee at the above address or call Carolyn Wright at (801) 538-5535 or myself at (801) 538-5559.

Sincerely,

John Harja  
Executive Director  
Resource Development Coordinating Committee

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